

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

v.

Case:2:19-cr-20836
Judge: Goldsmith, Mark A.
MJ: Stafford, Elizabeth A.
Filed: 12-18-2019 At 11:06 AM
USA V SEALED MATTER (LG)

D-1 RICHARD SOLLARS,
D-2 SHADY AWAD, and
D-3 JEFFREY BAUM,

Defendants.

**GOVERNMENT'S MOTION AND SUPPORTING BRIEF
TO SEAL INDICTMENT AND ARREST WARRANTS**

The United States of America hereby moves for an order sealing the Indictment and Arrest Warrants in this case and states:

1. The indictment in this case charges the Defendants with one or more federal crimes.
2. Rule 6(e)(4) of the Federal Rules of Criminal Procedure provides:

(4) Sealed Indictment. The magistrate judge to whom an indictment is returned may direct that the indictment be kept secret until the defendant is in custody or has been released pending trial. The clerk must then seal the indictment, and no person may disclose the indictment's existence except as necessary to issue or execute a warrant or summons.

Fed.R.Crim.P. 6(e)(4).

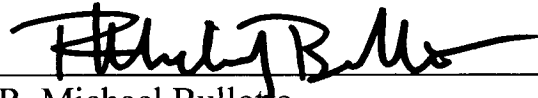
3. The government requests that the Indictment and Arrest Warrants be sealed because it is concerned that the Defendants may attempt to flee, destroy

evidence, or intimidate witnesses if the Indictment and Arrest Warrants become a matter of public record before the Defendants are arrested.

WHEREFORE, the government requests this Court to issue an order sealing the Indictment and Arrest Warrants.

Respectfully submitted,


Matthew Schneider
United States Attorney

A handwritten signature in black ink, appearing to read "R. Michael Bullotta", written over a horizontal line.

R. Michael Bullotta
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Dated: December 18, 2019

IT IS SO ORDERED.

A handwritten signature in black ink, appearing to read "Elizabeth A. Stafford", written over a horizontal line.

Elizabeth A. Stafford
United States Magistrate Judge

Entered: December 18, 2019